

THE CONTINUING EDUCATION COORDINATOR'S ***BULLETIN***

INFORMATION AND IDEAS FROM THE INDIAN HEALTH SERVICE CLINICAL SUPPORT CENTER

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RESULTS OF ACCME ACCREDITATION SITE SURVEY

The IHS Clinical Support Center recently completed the process of periodic review for reaccreditation by the Accreditation Council for Continuing Medical Education. As a result, CSC was awarded accreditation for four years as a sponsor of continuing medical education for physicians. ACCME accreditation seeks to assure both physicians and the public that continuing education activities sponsored by the CSC meet the high standards of the Essentials for accreditation as specified by the ACCME.

Among several suggestions for future improvement, there was one issue that the Accreditation Review Committee singled out for immediate attention. Since the issuance of the "Standards for Commercial Support of Continuing Medical Education" in 1992, several steps have been added to the sponsorship process that are intended to prevent interference in or control of continuing education by commercial interests.

This issue of the *Bulletin* will describe our response to the ACCME concerns, and the CSC's policies on commercial support and disclosure of financial or proprietary interest.

COMMERCIAL SUPPORT AND DISCLOSURE OF FINANCIAL OR PROPRIETARY INTEREST

Our interpretation of the "Standards of Ethical Conduct for Employees of the Executive Branch" is that it is improper for CE coordinators to accept gifts in the form of financial or other support from pharmaceutical or other companies for two reasons. First, since such companies seek to do business with the IHS, they are "prohibited sources." Second, only employees specifically authorized by the IHS Director to receive such support, from any source, may accept it.

Our argument before ACCME was that since IHS CE coordinators cannot accept commercial support, and since the CSC cannot sponsor activities that accept commercial support, we therefore do not have to show compliance with the "Standards for Commercial Support," which describe how to handle such support.

The Council accepted this reasoning, with one exception: all faculty at all IHS activities must nevertheless complete a "Disclosure of Financial or Proprietary Interest." We see the rationale for this.

It has been our experience that even though as a CE coordinator you do not arrange for or agree to accept financial support, two unexpected things can happen. First, the speaker can, without your knowledge, obtain his or her own commercial support in the form of an honorarium. Under the federal "Standards," this is unacceptable.

Second, the speaker may have existing relationships with commercial entities that, while not necessarily a conflict of interest, should be made known to the audience so that they can judge for themselves the influence this might have on the presentation. For example, if the speaker had received research grants from a company that markets antihypertensives, this should be known before he or she speaks on the topic of "Treatment of Hypertension."

The process is really fairly simple. When speaker agrees to participate, he or she should complete a "Disclosure of Financial or Proprietary Interest" (enclosed). The same form also collects information about their audiovisual equipment needs, and obtains information about their qualifications that you might use to introduce them.

If you are coordinating a regular activity (a meeting or conference running from several hours to several days), any significant commercial interests should be disclosed both in the brochure or course materials and in an announcement at the time of the presentation (e.g., "Dr. Smith is the recipient of a research grant from company x on the subject of '....'"

If this presentation is part of an hourly series, a verbal announcement at the time of the session is sufficient. A faculty member who presents frequently may complete one form on an annual basis.

You may feel uneasy about asking a speaker

about these matters; after all, they have already been kind enough to donate their time to speak. You needn't worry. All accredited sponsors are asking speakers to do this and the presenters are, or soon will be, familiar with it. If there are financial ties with an institution, there is nothing inherently wrong with that, it simply means that the audience needs to be aware of it.

The "Disclosure" forms do not need to be sent to the Clinical Support Center, but should be kept as part of the permanent records of the activity (unless sponsorship for pharmacy continuing education is sought; in that case, the American Council on Pharmaceutical Education requires that we have these forms in our CSC files).

Many facilities have begun using these forms and actually find them quite helpful. We encourage you to read the "Standards of Ethical Conduct for Employees of the Executive Branch" (ISBN 0-16-036302-0), which can be obtained from your Area Ethics Office or the U. S. Government Printing Office. Copies of the CSC Policies and Procedures for "Commercial Support" and Disclosure of Financial or Proprietary Interest" are available from the Clinical Support Center.

If you are not on the mailing list for this *Bulletin* or wish to receive any back issues, please call us at 602-640-2140 or write to:

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